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October 31, 2016

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court, EDNY
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Roosevelt McCoy v. City of New York, et al.,
Case No. 16-CV-1636 (AMD) (VMS)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to the defense of the above matter on behalf of defendant City of New York. I write to request a two-week enlargement of time for the City to comply with the Court's order dated October 7, 2016 directing the production of discovery material by November 4, 2016.

During the conference in this matter on October 7, 2016, the Court ordered the City to produce the complete investigative files for unrelated allegations of misconduct against the individual defendant officers for which the City had previously produced summaries on or before November 4, 2016. On October 27, the City produced approximately 580 pages of discovery material in accordance with the parties' agreement and the Court's directives. We anticipate that the production currently due on November 4 will total approximately 6,000 pages, and will also include audio and video files, which the City is in the process of reviewing and compiling.

Because of the volume of material that the City needs to review prior to production, the City respectfully requests an additional two weeks to produce this material, to November 18, 2016. Neither plaintiff nor co-defendants take a position on this request. Thank you for your consideration of this matter.

Respectfully Submitted,

s/
Amanda Papandrea (AP5987)
Assistant Corporation Counsel

cc: Gabriel Harvis, Esq., *counsel for plaintiff* (via ECF)
John Arlia, Esq., *counsel for defendant Desormeau* (via ECF)
James M. Moschella, Esq., *counsel for defendant Neve* (via ECF)